

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

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Laurie Ortolano

v.

The City of Nashua, et al.

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Civil Action No. 22-cv-00326-LM

**JOINT MOTION TO SUSPEND PRETRIAL FILING DEADLINES AND TO  
CONTINUE PRETRIAL CONFERENCE AND TRIAL AS NEEDED**

NOW COME the parties in the above-captioned matter and request that the Court suspend the current Pretrial Filing Deadlines and Continue the Pretrial Conference and Trial as needed until pending motions are decided. In support hereof, the Parties state as follows:

1. This case is scheduled for trial to take place the period beginning October 16, 2024, with a pretrial conference set for October 2, and pretrial filing deadline of September 11, 2024.

2. All Defendants have filed Motions for Summary Judgment on all counts. Plaintiff objected and replies have been filed. In total there were six separate summary judgment motions addressing the claims against the eight remaining defendants, plus ancillary motions for relief related thereto.

3. Each such motion remains pending.

4. Rulings on these motions may significantly impact the scope (and even necessity) of trial and, consequently, the scope of pretrial filings.

5. It is unclear whether the Court will have an opportunity to rule on the pending motions prior to the current pretrial filing deadline or even prior to the current pretrial conference and trial dates.

6. As such, the Parties respectfully request that the Court suspend the current pretrial filing deadline of September 11, 2024, and – to the extent necessary - continue the pretrial conference and trial to allow consideration of the pending motions and potential post-decision motions relating to same.

7. To the extent the Court considers continuing the trial necessary, counsel have conferred and are available during the Court’s April 2025 trial period (April 15-26, 2025).

8. Pursuant to L.R. 7.2 undersigned counsel contacted their respective clients prior to the filing of the Motion and advised them of the possibility of a continuance of the trial.

9. Because this motion only addresses pretrial filings and trial dates and not discovery deadlines, a Civil Form 3 has not been filed herewith.<sup>1</sup>

WHEREFORE, the Parties respectfully request this Honorable Court:

- A. Suspend the pretrial motion filing deadline to permit consideration of pending motions and possible post-decision motions relating to same;
- B. Continue the pretrial conference and trial dates if needed; and
- C. Grant such further relief as the Court deems fair and just.

Date: September 4, 2024

Respectfully submitted,

**Laurie Ortolano**

**City of Nashua, Michael Carignan, and  
Frank Lombardi**

By counsel,

By counsel,

**OLSON LAWYERS**

**CULLEN COLLIMORE SHIRLEY, PLLC**

/s/ Kurt S. Olson

/s/ Brian J. S. Cullen

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<sup>1</sup> Plaintiff has indicated that she intends to file a separate motion to conduct additional depositions after the summary judgment motions are decided. Defendants expect to object.

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**CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: September 4, 2024

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen